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December 23, 2011

VIA ECF FILING

Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn NY 11201

**Re: *Sacardi v. Green Field, et al.* (10-cv-5605(BMC))
Letter Responding to Ms. Goldberg's Allegations**

Dear Judge Cogan:

The undersigned respectfully writes this letter to clarify Ms. Goldberg's misunderstanding and mischaracterization.

About two days ago, the undersigned spoke with Courtroom Deputy Melonie Clarke to discuss Section IV(B)(4) of the "Individual Practices of Judge Brian M. Cogan," mainly (i) whether she would prefer a certain style/template of the witnesses and exhibits lists, and (ii) whether any documents to be used for impeachment purposes should also be listed on the exhibit list.

For the sake of judicial efficiency, the undersigned was told to pre-mark, at the beginning of the trial, any and all documents to be used at trial even for impeachment purposes. When inquired about the newly discovered documents, Ms. Clarke told me that she could not accept anything that's not listed in the JPTO and that I should speak with Court Clerk Daniel _____ regarding the newly discovered documents because the court does not like surprises at trial.

The undersigned spoke with the court clerk today around 4p.m. as to whether the newly discovered documents to be used for FRE 608(b) purposes, not mentioned in the JPTO, could and should be also pre-marked at the beginning of the trial. Court Clerk kindly advised me to use my discretion.

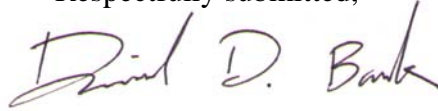
It was after my mentor, a seasoned attorney and a part-time village court judge, advised that I should write to the court for clarification and advice in this matter, the undersigned filed the initial letter today.

The initial letter identifies the newly discovered documents, the reason for making such request, and a brief explanation of what the undersigned seeks to establish from each of the documents under FRE 608(b).

The undersigned never had such bad faith intent, only a good faith attempt to clarify the practices and rules.

A copy of this request letter has been sent to all Defendants and Plaintiff's counsel.

Respectfully submitted,

A handwritten signature in purple ink that reads "Daniel D. Baek". The signature is stylized with a large, flowing 'D' and a cursive 'Baek'.

Daniel D. Baek (DB6632)

Counsel for Hudson Kim

cc: Lauren Goldberg, Esq. via ECF
David Hong, Esq. via ECF
Daniel Lee, *pro se* via danieljudelee@gmail.com